



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 10 2016

CERTIFIED MAIL 7009 1680 0000 7648 7573
RETURN RECEIPT REQUESTED

Mr. Eric Vermillion
Assistant General Manager
The Crown Group Company – Livonia Plant
31774 Enterprise Drive
Livonia, Michigan 48150

Re: Notice of Violation
Compliance Evaluation Inspection
MID109179754

Dear Mr. Vermillion:

On November 19, 2015, a representative of the U.S. Environmental Protection Agency inspected The Crown Group Company – Livonia Plant (Crown Group) facility located in Livonia, Michigan. As a small quantity generator of hazardous waste, Crown Group is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Crown Group's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Crown Group, EPA's review of records pertaining to Crown Group, and the inspector's observations, EPA has determined that Crown Group has unlawfully stored hazardous waste without a license or interim status as a result of Crown Group's failure to comply with certain conditions for a license exemption under Michigan Administrative Code (hereafter "MICH. ADMIN. CODE"), MICH. ADMIN. CODE r. 299.9306(2) and (4)-(6) [40 C.F.R. § 262.34(c) and (d)-(f)]. EPA has identified the license exemption conditions with which Crown Group was out of compliance at the time of the inspection in paragraphs 1 and 2, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the

corresponding TSD requirement. The exemption conditions identified in paragraph 3 is also an independent TSD requirement incorporated from MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q). Accordingly, each failure of Crown Group to comply with these conditions is also a violation of the corresponding requirement in MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or MICH. ADMIN. CODE r. 299.9601(1) and (2) and 299.11003(1)(m)-(o) [40 C.F.R. Part 264] (if the facility should have been licensed).

Finally, EPA has determined that Crown Group violated RCRA requirements related to land disposal restriction documentation as described in paragraph 4, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, Crown Group was out of compliance with the following small quantity generator license exemption conditions:

1. Satellite Container Management

Under MICH. ADMIN. CODE r. 299.9306(2) [40 C.F.R. § 262.34(c)(ii)], a small quantity generator must mark each satellite accumulation container holding hazardous waste with the words "Hazardous Waste." In the State of Michigan, it is further required under MICH. ADMIN. CODE r. 299.9306(2) that satellite accumulation containers used to store hazardous waste must also be labeled or marked with the hazardous waste number (code) of the waste, or the chemical name for the hazardous waste number of the waste.

During the inspection of the area adjacent to the Powder Room, there was one satellite accumulation area (SAA) that consisted of one 55-gallon fiber drum. The drum contained spent aerosol cans. The drum was labeled as "Aerosol Can Disposal Only" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum.

During the inspection of the Shipping/Receiving area, there was one SAA that consisted of one 55-gallon drum. The drum contained spent aerosol cans. The drum was labeled as "Aerosol Cans" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum.

2. Posting Emergency Information

Under MICH. ADMIN. CODE r. 299.9306(4)(g) [40 C.F.R. § 262.34(d)(5)(ii)(A)-(C)], a small quantity generator must post, next to the telephone, the name and telephone number of the emergency coordinator; the location of the fire extinguishers and spill control

material and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm.

During the site tour, there was no observed posting of the facility's emergency information and equipment next to a phone.

The license exemption condition identified below in paragraph 3 is also an independent TSD requirement violated by Crown Group:

3. Testing and Maintenance of Emergency Equipment

Under MICH. ADMIN. CODE r. 299.9306(4)(e) [40 C.F.R. §§ 262.34(d)(4) and 265.33], all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

During the inspection of the Waste Water Treatment Area, the combination safety shower/eye wash station was not maintained to assure operation since there were hoses and other items resting upon the inverted shower head.

Summary: By failing to comply with the conditions for a license exemption, above, Crown Group became an operator of a hazardous waste storage facility and was required to obtain a Michigan hazardous waste storage license. Crown Group failed to apply for such a license. Crown Group's failure to apply for and obtain a hazardous waste storage license violated the requirements of MICH. ADMIN. CODE r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from MICH. ADMIN. CODE r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSD requirement.

Crown Group violated the following generator requirement:

4. Land Disposal Restriction Documentation

Under MICH. ADMIN. CODE r. 299.9311(1) [40 C.F.R. § 268.7(a)(1)-(2)], a generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards in 40 C.F.R. §§ 268.40, 268.45, or 268.49. This determination can be made either by testing the waste, or by using knowledge of the waste. Also, if the waste or contaminated soil does not meet the applicable treatment standard, then, the generator shall send a one-time written notice to each treatment or storage facility receiving the waste with the initial waste shipment, and shall place a copy in the generator's file.

Under MICH. ADMIN. CODE r. 299.9311(1) [40 C.F.R. § 268.7(a)(8)], a generator must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal.

EPA's inspection of manifests and records during the inspection indicated that there was no LDR notice available for review for the hazardous waste (D002) shipment (manifest # 010814448 JJK) to EQ Detroit, Inc., that occurred on May 13, 2013. Also, there was no LDR notice available for review for the hazardous waste (D002) shipment (manifest # 010306450 JJK) to EQ Detroit, Inc., that occurred on August 17, 2013. Furthermore, there was no LDR notice available for review for the hazardous waste (D001) shipment (manifest # 002878454 GBF) to Petro-Chem Processing Group, Inc., that occurred on August 19, 2015. Thus, there was no LDR notification available at the time of the inspection for the above-mentioned hazardous waste shipments.

At this time, EPA is not requiring Crown Group to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1-3, above.

After the inspection, as documented in a December 16, 2015 letter to EPA, and in a January 14, 2016 email to EPA, you took certain actions to establish compliance with the above conditions and land disposal restriction notice requirements. Based on the information received from Crown Group on December 16, 2015, and January 14, 2016, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Crown Group's cooperation.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at gangwisch.bryan@epa.gov.

Sincerely,



Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

cc: Tracy Kecskemeti, MDEQ – Southeast Michigan District Office
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: The Crown Group Co., - Livonia Plant

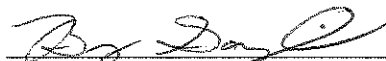
EPA ID No.: MID109179754

ADDRESS: 31774 Enterprise Drive
Livonia, MI 48150

DATE OF INSPECTION: November 19, 2015


EPA INSPECTOR: Bryan Gangwisch

PREPARED BY:


Bryan Gangwisch
Environmental Scientist
Compliance Section #2

12/9/15
Date Completed

APPROVED BY:


Julie Morris, Chief
Compliance Section #2

12/15/15
Date

Purpose of Inspection

This inspection was an evaluation of The Crown Group Co., - Livonia Plant (Crown Group), and its compliance with hazardous waste regulations found at Michigan Administrative Code (MAC) and the Code of Federal Regulations (CFR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Eric Vermillion, Assistant General Manager	Crown Group
Carl A. Vogt, Corporate Environmental Engineer	Crown Group
Jason Nowak, Environmental Engineer	Crown Group
Bryan Gangwisch, Environmental Scientist	U.S. EPA

Introduction

I arrived at the site on November 19, 2015, at approximately 9:55 a.m. The weather consisted of sunny conditions with moderate wind, and an ambient air temperature of approximately 50 degrees Fahrenheit. I entered the facility and waited in the reception area. As Mr. Vogt arrived, I introduced myself, presented my inspector credentials, and described the purpose of the inspection and the process by which I intended to conduct the inspection. I was led to Mr. Vermillion's office. Mr. Vermillion, Mr. Vogt, and Mr. Nowak provided me with a verbal description of the site, led the tour throughout the facility, and then attempted to provide me with the records I requested for review.

Site Description

During the opening conference Mr. Vermillion, Mr. Vogt, or Mr. Nowak stated all of the following unless otherwise noted: Crown Group began operations at this location in 1984. The facility conducts coating operations on steel parts (automotive) that are received. There are approximately 90 employees at this facility that work one ten hour shift typically Monday through Friday.

The metal coating operations were comprised of the following stages: alkaline cleaner, rinse tanks, phosphoric acid tank, rinses, zinc phosphate, rinses, e-coat or powder coat, oven, and then parts are packaged for shipping. All of the rinses and overflow go to the waste water treatment portion of the facility. The waste water is discharged to the city sewer and is regulated via pre-treatment permit No. 156-95626-IU through the Detroit Water and Sewerage Department (DWSD).

Crown Group was operating as a small quantity generator at the time of the inspection according to facility personnel and the facility's determination of their waste generation rate.

The main waste streams that are regularly generated at Crown Group consist of: sludge filter cake from zinc phosphate (TLC landfill in Farmington, Michigan), waste powder paint, powder paint filters, e-coat filters, burn-off oven ash, waste water treatment filter cake (except from zinc phosphate), wax paper, rags, aerosol cans, spent parts washer solvent. The hazardous waste codes associated with the main hazardous waste types that are generated at Crown Group consist of: D001, D002. There is minimal used oil generation at the facility. There were universal waste bulbs observed. The facility's spent fluorescent bulbs are picked up for recycling. The facility's fork lifts are serviced by an outside vendor. The facility's scrap metal is picked up for recycling (TLC – Farmington, Michigan). The facility's generated scrap wood and plastic pallets, and paper is also picked up for recycling. The facility did not generate spent universal waste batteries. There was no electronic waste observed during the inspection.

Site Tour

A physical walk-through of the facility was conducted at approximately 10:50 a.m. We started at the Pre-Treatment area, Stage 1. A heavy alkaline soap cleaner is utilized at this stage as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

At Stage 2, another soap cleaner is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

I then observed two temporary product storage tanks that will hold the product cleaner solution on a temporary basis for cleanout of the process tanks as stated by Mr. Vermillion. Then the product cleaner solution is returned back into the process tanks after they are cleaned out as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

Next, I observed two temporary product storage tanks that will hold the product zinc phosphate solution on a temporary basis for cleanout of the zinc phosphate process tank as stated by Mr. Vermillion. Then the product zinc phosphate solution is returned back into the process tank after it is cleaned out as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

At Stage 3, a city water rinse is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

Next, at Stage 4, a city water rinse is also utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

At Stage 5, an acid cleaner is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

I then observed two temporary product storage tanks that will hold the product acid cleaner solution on a temporary basis for cleanout of the acid cleaner process tank as stated by Mr. Vermillion. Then the product acid cleaner solution is returned back into the process tank after it

is cleaned out as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

I then observed the reverse osmosis tank and the containment trench surrounding the pre-treatment area, which is piped to the waste water treatment system.

Next, I inspected the Oberlin Press (zinc phosphate sludge) area. There was one 55-gallon hopper that contained zinc phosphate sludge.

At the Waste Water Treatment Room, I observed the burn-off oven ash wash area, and one 100-gallon hopper that contained burn-off ash. There were several drums that contained product lube oil as stated by Mr. Vogt.

Next, I inspected the Storage Room. There was one box that contained spent four foot bulbs. The box was labeled as "Universal Waste Lamps", was dated 9/11/15, and was closed. There was one other box that contained spent eight foot bulbs. The box was labeled as "Universal Waste Lamps", was dated 9/11/15, and was closed. There were several empty drums in the area.

At the Waste Water Treatment Tank area, there was one 350-gallon hopper that contained filter cake.

Next, I observed Stages 6 and 7, where city water rinses are utilized as stated by Mr. Vermillion. There was no waste observed in these areas at the time of the inspection.

At Stage 8, a solution (fixodine) is utilized to prepare the metal to receive the zinc phosphate coating as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

Next, I observed Stage 9, where the zinc phosphate solution is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

At Stage 10, a city water rinse is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

Next, I observed Stage 11, where a city water rinse is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

At Stage 12, a sealer solution (parcolene) is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

Next, I observed Stage 13, where the de-ionized and reverse osmosis process is utilized as stated by Mr. Vermillion. There was no waste observed in this area at the time of the inspection.

At the E-Coat Bath area, there was no waste observed in this area at the time of the inspection.

Next, I inspected the Process Control Room. There was no waste observed in this area at the time of the inspection.

At the area under the E-Coat Line, there were two 250-gallon totes that contained product wax as stated by Mr. Vogt. There was no waste observed in this area at the time of the inspection.

Adjacent to the Powder Room, there was one satellite accumulation area (SAA) that consisted of one 55-gallon fiber drum. The drum contained spent aerosol cans. The drum was labeled as "Aerosol Can Disposal Only" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum. A picture was taken.

Next, I inspected the Powder Coat Room. There was no waste observed in this area at the time of the inspection.

At the Storage Room, there were several fiber drums that contained raw product powder as stated by Mr. Vermillion.

Next, I inspected the Wax Area. There was no waste observed in this area at the time of the inspection.

At the Shipping/Receiving area, there was one SAA that consisted of one 55-gallon drum. The drum contained spent aerosol cans. The drum was labeled as "Aerosol Cans" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum. A picture was taken.

Outside of the facility, there were two roll-off containers observed. The first roll-off container was a 20 cubic-yard container that contained the zinc phosphate sludge, waste water treatment filter cake, burn-off ash, and powder coat waste as stated by Mr. Vermillion. This roll-off container was labeled as "Special Solid Waste" and was covered. A picture was taken. The other roll-off container was a 50 cubic-yard container that contained scrap metal as stated by Mr. Vermillion.

Back inside of the facility, at the Waste Water Treatment Area, I observed the area where hazardous waste is stored as stated by Mr. Vermillion. There was no hazardous waste in storage at the time of the inspection. There was no used oil in storage at the time of the inspection. There was a fire extinguisher, decontamination equipment, spill control equipment, and two-way radio usage by employees in the vicinity. Aisle space was sufficient in this area. The combination safety shower/eye wash station was not maintained to assure operation since there were hoses and other items resting upon the inverted shower head.

Also, during the site tour, I did not observe any posting of the facility's emergency information and equipment next to a phone.

Record Review

The review of records was conducted. The recent manifests show that all hazardous waste was sent to the following TSDFs: EQ Detroit, Inc. (MID980991566), Clean Harbors Environmental Service, Inc. (OHD000724153), Spring Grove Resource Recovery, Inc., and Petro-Chem Processing Group (MID980615298). The following transporters were also used: Heritage – Crystal Clean, LLC (ILR000130062), Robbie Wood, Inc. (ALD067138891), Clean Harbors Environmental Service, Inc. (MAD039322250), and Safety-Kleen Systems, Inc. (TXR000081205). At least three years of manifests were retained on-site. There was no LDR notice available for review for the hazardous waste (D002) shipment (manifest # 010814448 JJK) to EQ Detroit, Inc., that occurred on May 13, 2013. There was no LDR notice available for review for the hazardous waste (D002) shipment (manifest # 010306450 JJK) to EQ Detroit, Inc., that occurred on August 17, 2013. There was no LDR notice available for review for the hazardous waste (D001) shipment (manifest # 002878454 GBF) to Petro-Chem Processing Group, Inc., that occurred on August 19, 2015. There were no hazardous waste shipments that occurred in 2014. There were three hazardous waste shipments that had occurred at the time of the inspection in 2015. The hazardous waste shipments in 2015 included: approximately 400 pounds (D001- one drum) shipped on August 19, 2015; 2,000 pounds (D002) shipped on October 7, 2015; and 100 pounds (D002) shipped on October 7, 2015.

I observed the facility's waste water discharge pre-treatment permit No. 156-95626-IU through the Detroit Water and Sewerage Department (DWSD). The pre-treatment permit was effective September 2, 2013 and has an expiration date of September 1, 2016.

Crown Group submitted its hazardous waste biennial report for the year 2013.

The facility conducts weekly inspections of the Waste Water Treatment Area (hazardous waste storage area) when there is hazardous waste in storage as stated by Mr. Nowak. The emergency equipment (one combination safety shower/eye wash) was not being maintained to assure operation.

Waste determinations were documented through analysis/waste profile, and/or MSDS. The analytical testing data/profile for the filter cake from zinc phosphate waste stream was reviewed. Merit Laboratories, Inc., performed (on 4/20/15) a TCLP analysis on the filter cake from zinc phosphate waste stream. The analytical testing data/profile for the waste water treatment filter cake waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 3/17/15) a TCLP analysis on the waste water treatment filter cake waste stream. The analytical testing data/profile for the wax rags waste stream was reviewed. Merit Laboratories, Inc., performed (on 4/20/15) a TCLP analysis on the wax rags waste stream. The analytical testing data/profile for the burn-off oven ash waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 3/17/15) a TCLP analysis on the burn-off oven ash waste stream. The analytical testing data/profile for the e-coat filter bags waste stream was reviewed. Trace Analytical Laboratories, Inc., performed (on 3/17/15) a TCLP analysis on the e-coat filter bags waste stream. A waste profile for the powder coat paint cleanup residual waste stream was reviewed. An MSDS for the cavity wax was reviewed.

There were no reported spills or fires related to hazardous waste as stated by Mr. Vermillion. The entire facility is equipped with a public address and sprinkler system as stated by Mr. Vermillion. The facility's emergency coordinators are Chris Siemion (primary) and Glen Ford, Mike Whittaker, and Mr. Vogt (alternates).

Closing Conference

I summarized the RCRA requirements for the following: SAA hazardous waste container management, posting of emergency information and equipment next to a phone, maintaining emergency equipment to assure operation, and documentation and retention on-site of LDR notices. The inspection concluded at approximately 1:35 p.m.

Crown Group made no claim of confidential business information related to any information obtained, or any pictures taken by U.S. EPA during the inspection.

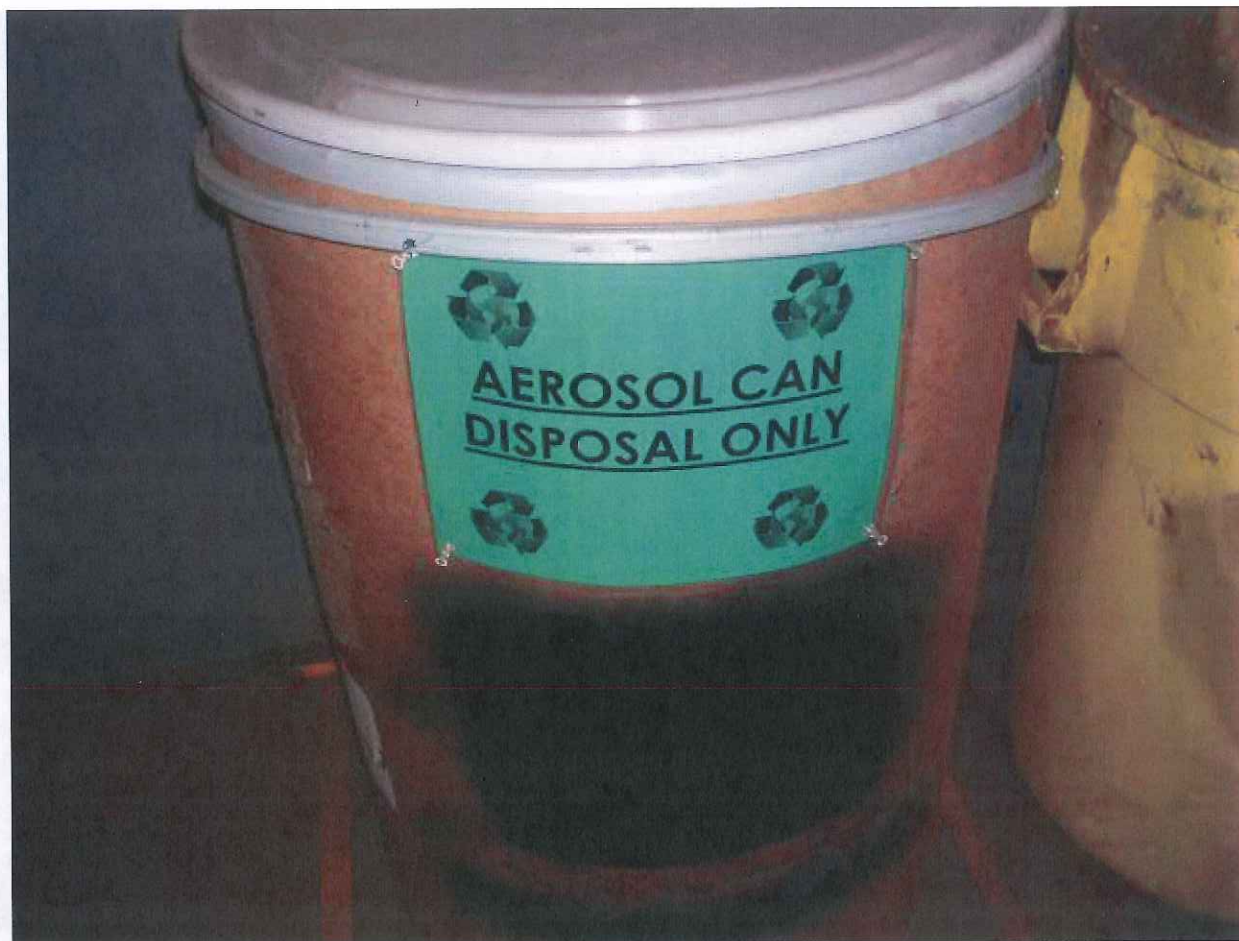
Documents received during this inspection are as follows:

- copy of manifest # 008380223 FLE (ship date – 10/7/15)
- copy of manifest # 008380221 FLE (ship date – 10/7/15)

Documents given to Crown Group during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Michigan RETAP handout

A photo log is attached consisting of three (3) photos taken by U.S. EPA during the inspection.



1. A view, at an area adjacent to the Powder Room, of one satellite accumulation area (SAA) that consisted of one 55-gallon fiber drum. The drum contained spent aerosol cans. The drum was labeled as "Aerosol Can Disposal Only" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum.

The Crown Group Co., - Livonia Plant, Livonia, MI
Bryan Gangwisch, U.S. EPA 11/19/15



2. A view, at the Shipping/Receiving area, of one SAA that consisted of one 55-gallon drum. The drum contained spent aerosol cans. The drum was labeled as "Aerosol Cans" and was closed. There was no "Hazardous Waste" label and no hazardous waste code or chemical name on the drum.

The Crown Group Co., - Livonia Plant, Livonia, MI
Bryan Gangwisch, U.S. EPA 11/19/15



3. A view, outside of the facility, of one 20 cubic-yard roll-off container that contained the zinc phosphate sludge, waste water treatment filter cake, burn-off ash, and powder coat waste as stated by Mr. Vermillion. This roll-off container was labeled as "Special Solid Waste" and was covered.

The Crown Group Co., - Livonia Plant, Livonia, MI
Bryan Gangwisch, U.S. EPA 11/19/15

**Department of Environmental Quality
SMALL QUANTITY GENERATOR INSPECTION FORM**

Facility's Name The Crown Group Co., - Livonia Plant Part 3 Rules
 Date 11/19/15 ID# MD109179754 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Aerosol can waste 0001	General operations	Small Quantity Generator only
corrosive liquids 0002	Cleanout of process tanks	" " " "

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS
(NI - Not Inspected N/A - Not Applicable)

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

	YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	262A <input checked="" type="checkbox"/> NI	N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D <input checked="" type="checkbox"/> NI	N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3))	262A <input checked="" type="checkbox"/> NI	N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A <input checked="" type="checkbox"/> NI	N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

3. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	262D <input checked="" type="checkbox"/> NI	N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	262D <input checked="" type="checkbox"/> NI	N/A
5. Manifests, prepared by the generator (Rule 304(1)(b): 40 CFR 262.20(a)), contain the following?	262B <input checked="" type="checkbox"/> NI	N/A
a) manifest document number. (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(b)&(c))	262B <input checked="" type="checkbox"/> NI	N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
h) generator signature, initial transporter & date of acceptance? (Rule 304(1)(b): 40 CFR 262.20(a))	262B <input checked="" type="checkbox"/> NI	N/A
6. Not Applicable		
7. For out-of-state manifests, was copy of 3 rd signature manifest submitted to Director? (Rule 304(2)(c))	262B <input checked="" type="checkbox"/> NI	N/A
8. Is the transporter used properly registered /permitted under Act 138, Section 3 (2)? (Rule 304(1)(c))	262B <input checked="" type="checkbox"/> NI	N/A
9. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20(a))	262B <input type="checkbox"/> NI	N/A
10. Reportable exceptions. (Rule 308(5): 40 CFR 262.42(b))		
a) number of manifests generator HASN'T receive signed copy from TSD w/in 60 days.	262D	N/A
b) number generator DID NOT submit copy of manifest & statement on non-confirmation of delivery to DEQ.	262D	N/A

OR

11. Did the facility manifest hazardous waste off-site which:		
a) is reclaimed under contractual agreement & reclaimed material comes back? Rule 304(3)(a): 40 CFR 262.20(e)	262D <input type="checkbox"/> NI	N/A
b) does facility maintain copy of contractual agreement on-site for not less than 3 years? (Rule 304(3)(b): 40 CFR 262.20(e))	262D <input type="checkbox"/> NI	N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h)

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)(Rule 311(1))

Note: Not all requirements applicable if waste shipped off-site and material returned under contractual agreement.

YES NO

12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a)(1))		
a) all listed waste	268A	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (40 CFR 268.7(a)(2))	268A	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
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OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/> NI N/A
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OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (40 CFR 268.7(a)(4))	268A	<input type="checkbox"/> NI N/A
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OR

16. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (40 CFR 268.7(a)(9))	268A	<input type="checkbox"/> NI N/A
17. Did the notice include: (40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
a) EPA hazardous waste #?	268A	<input checked="" type="checkbox"/> NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input checked="" type="checkbox"/> NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input checked="" type="checkbox"/> NI N/A
d) manifest number associated with the shipment?	268A	<input checked="" type="checkbox"/> NI N/A
e) waste analysis data, where available?	268A	<input checked="" type="checkbox"/> NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input checked="" type="checkbox"/> NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1) & 268.9)	268A	<input type="checkbox"/> NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	268A	<input type="checkbox"/> NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

18. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	268A	<input checked="" type="checkbox"/> NI N/A
19. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR 268.7(a)(7))	268A	<input type="checkbox"/> NI N/A
20. Were all notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	268A	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3) RULE 311(1)

21. Generator dilutes hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (40 CFR 268.40) RULE 311(1)

22. If wastes exceeding treatment standards are mixed, were the most stringent standards selected? (40 CFR 268.40(c))	268A	<input type="checkbox"/> NI N/A
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PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

23. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	262C	<input checked="" type="checkbox"/> co. said <input type="checkbox"/> obsr'd NI N/A
24. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)&(c): 40 CFR 262.32(a))	262C	<input checked="" type="checkbox"/> co. said <input type="checkbox"/> obsr'd NI N/A
25. On containers 119 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	<input checked="" type="checkbox"/> co. said <input type="checkbox"/> obsr'd NI N/A

26. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
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ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

*No hazardous waste in storage
at time of inspection*

27. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) do containers have accumulation date & visible? (Rule 306(4)(c): 40 CFR 262.34(d)(4))	262C	<input type="checkbox"/> <u>NI</u> N/A
b) do container have words "Hazardous Waste"? (Rule 306(4)(d): 40 CFR 262.34(d)(4))	262C	<input type="checkbox"/> <u>NI</u> N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(4)(c))	262C	<input type="checkbox"/> <u>NI</u> N/A
d) has more than 180 (270 if over 200 miles) days elapsed since date marked? (Rule 306(4) or (5): 40 CFR 262.34(d) or (e))	262C	<input type="checkbox"/> <u>NI</u> N/A
e) has quantity of waste exceeded 6000 kg? (Rule 306(4)(a): 40 CFR 262.34(d)(1))	262C	<input type="checkbox"/> <u>NI</u> N/A

UNLESS

f) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/> <u>NI</u> N/A
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The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

g) are containers in good condition? (265.171)	262C	<input type="checkbox"/> <u>NI</u> N/A
h) are containers compatible with waste in them (265.172)	262C	<input type="checkbox"/> <u>NI</u> N/A
i) are containers stored closed? (265.173(a))	262C	<input type="checkbox"/> <u>NI</u> N/A
j) are containers handled/stored in a way which may rupture if or cause leaks? (265.173(b))	262C	<input type="checkbox"/> <u>NI</u> N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input type="checkbox"/> <u>NI</u> N/A
l) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input type="checkbox"/> <u>NI</u> N/A
m) are hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input type="checkbox"/> <u>NI</u> N/A
n) are incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input type="checkbox"/> <u>NI</u> N/A
o) if facility accumulates over 1000 kg is there secondary containment which? (Rule 306(4)(b)(i))	262C	<input type="checkbox"/> <u>NI</u> N/A
i) if accumulating free liquids or F020, F021, F022, F023, F026 & F027, the hazardous waste accumulation area :		
A) has impervious base free of cracks? (264.175(b)(1))	262C	<input type="checkbox"/> <u>NI</u> N/A
B) is sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input type="checkbox"/> <u>NI</u> N/A
C) holds 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input type="checkbox"/> <u>NI</u> N/A
D) prevents run-on unless sufficient capacity? (264.175(b)(4))	262C	<input type="checkbox"/> <u>NI</u> N/A
E) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input type="checkbox"/> <u>NI</u> N/A
ii) if accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c) (1&2))	262C	<input type="checkbox"/> <u>NI</u> N/A

28. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input type="checkbox"/> <u>X</u> NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input type="checkbox"/> <u>X</u> NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
29. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste: (Rule 306(2): 40 CFR 262.34(c)(2))		
a) mark the container with the date the excess amount began accumulating?	262C	<input type="checkbox"/> <u>NI</u> N/A
b) move to an area with secondary containment?	262C	<input type="checkbox"/> <u>NI</u> N/A
30. Is hazardous waste accumulated in anything other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>yes 2002 solids/liquids Explain any yes answer.</i>		<input checked="" type="checkbox"/> <u>NI</u> N/A
31. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
32. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(4)(j))	262C	<input checked="" type="checkbox"/> <u>NI</u> N/A
33. Is hazardous waste accumulated in tanks? <i>No</i> If so, complete Tank System inspection form.		<input type="checkbox"/> <u>X</u> NI N/A
34. Is hazardous waste placed on drip pads? <i>No</i> If so, complete Wood Preserving inspection form		<input type="checkbox"/> <u>X</u> NI N/A

PERSONNEL TRAINING (Rule 306(1)(d) & 40 CFR 262.34(a)(4))

YES NO

35. Emergency coordinator(s) identified & available at all times? (Rule 306(4)(f); 40 CFR 262.34(d)(5)(i))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
36. Next to phone is the following posted? (Rule 306(4)(g); 40 CFR 262.34(d)(5)(ii)(A-C))		
a) name & phone number of emergency coordinator(s)	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) location of fire extinguishers, spill control equipment and fire alarms, if present?	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
c) phone number of fire department (not needed if direct alarm)?	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
37. Employees know waste handling & emergency procedures? (Rule 306(4)(h); 40 CFR 262.34(d)(5)(iii))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
38. If facility has had emergency, did coordinator take appropriate response? (Rule 306 (4)(i); 40 CFR 262.34(d)(iv)(A-B))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

AND

39. If there has been a fire, explosion or release which threatened human health or if spill reached surface water did facility call PEAS and NRC? (Rule 306(4)(i)(iii)(A-H); 40 CFR 262.34 (d)(5)(iv)(C)(1-5).	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
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Rule 306(4)(e) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37

40. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
41. If required, does this facility have the following equipment:		
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
42. Testing and Maintenance of Emergency Equipment:		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) has owner/operator provided immediate access to internal alarms? (265.34(a & b)) NOTE: Access to communication or alarm system is applicable only if required 40 CFR 265. 32		
i) when hazardous waste is being poured, mixed, etc.	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
ii) if only one employee on the premises while facility is operating.	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
43. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

44. Has the facility imported or exported hazardous waste?		<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
a) Exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (262.52(a))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
ii) receiving country consented to accept waste. (262.52(b))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iii) has copy of EPA Acknowledgment of Consent. (262.52(c))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	<input type="checkbox"/> <input type="checkbox"/> NI N/A

COMMENTS:

**Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION**

Facility Name The Crown Group Co., - Livonia Plant Part 2 Rules
Date 11/19/15 I.D. # MED 109 179 754 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

YES NO

1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14) *None observed during inspection*

ANTIFREEZE: (Rule 228(4))

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i)); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

ELECTRIC LAMPS: (Rule 228(4) ;273.13(c);273.14(d))**QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(ii))	273.B	<input checked="" type="checkbox"/> NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii) (B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input type="checkbox"/> NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14**QTY HANDLED:***None observed during inspection*

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	<input type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> NI N/A

*None observed***PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)****QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible]	273.B	<input type="checkbox"/> NI N/A

*None observed***PHARMACEUTICALS: (Rule 228(4))****QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a):40 CFR 273.18(g))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> <input type="checkbox"/> NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D		[]	N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D		[]	N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D		[]	N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D		[]	N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? <i>Shipping papers cannot describe universal waste as "hazardous waste, (I) or (S), n.o.s."</i> <i>nor have waste added to USDOT proper shipping name.</i> (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D		[]	N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D		[]	N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D		[]	N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D		[]	N/A

COMMENTS:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.